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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 United States of America,
16
17 Plaintiff,
18
19 v.
20 Lindsay Summer Carter,
21
22 Defendant.

Case No. 2:23-mj-00533-DJA

Stipulation and Proposed Order

23 Ms. Carter was charged by complaint on June 22, 2023, with two counts: (1)
24 Operating a Motor Vehicle while Under the Influence of Alcohol and Drugs (a
25 violation of 36 C.F.R. § 4.23(a)(1)) and (2) Refusal to Submit to a Chemical Test (a
26 violation of 36 C.F.R. § 4.23(c)(2)). (ECF No. 1.)

27 Ms. Carter entered a plea agreement on March 20, 2024. (ECF No. 19.) Under
that agreement, Ms. Carter pleaded guilty to Count One. (*Id.*) Count Two was
dismissed. (*Id.*) Ms. Carter was sentenced on Count One as follows: “Defendant is
sentenced to one year unsupervised probation; \$500.00 fine and \$10.00 penalty
assessment; attend and complete lower court DUI course and victim impact panel;
complete eight (8) hours online alcohol awareness course; and restricted from Lake
Mead National Recreational Area for six months. Should the defendant complete her

obligations within the first six months of her unsupervised probation, the court will allow the defendant to withdraw her guilty plea to count one and the government will move to amend count one to reckless driving, see plea agreement.” (*Id.*)

Ms. Carter now has completed the special conditions of her unsupervised probation. Accordingly, the parties agree that Count One should be amended to Reckless Driving, and the status conference set for April 11, 2025 at 11:30 AM should be vacated.

Dated: March 27, 2025

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

Sue Fahami
Acting United States Attorney

/s/ Rick A. Mula

Rick A. Mula
Assistant Federal Public Defender

/s/ Skyler H. Pearson

Skyler H. Pearson
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,
Plaintiff,
v.
Lindsay Summer Carter,
Defendant.

Case No. 2:23-mj-00533-DJA

Order

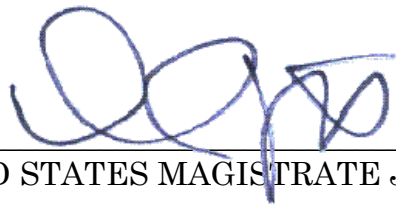
The Court finds that Ms. Carter has completed the special conditions of her unsupervised probation in accordance with her plea agreement and sentence.

IT IS THEREFORE ORDERED that Ms. Carter is permitted to withdraw her guilty plea to Count One: Operating a Motor Vehicle Under the Influence.

IT IS FURTHER ORDERED that the Court, consistent with the plea agreement and sentence, enters a plea of guilty to Amended Count One: Reckless Driving.

IT IS FURTHER ORDERED that the status conference set for April 11, 2025 at 11:30 AM is vacated.

DATED this 2nd day of April, 2025.



UNITED STATES MAGISTRATE JUDGE